

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

COURTNEY CURTIS,

Defendant.

No. 4:20CR712 SRC

**INFORMATION**

**THE UNITED STATES ATTORNEY CHARGES:**

**COUNTS 1-3**  
**WIRE FRAUD**

**A. INTRODUCTION**

At all times relevant to the Information:

1. Defendant **COURTNEY CURTIS** (hereinafter referred to as “**CURTIS**”) was the Representative of Missouri District 73 in the Missouri Legislature, serving from January, 2013 until his resignation on December 5, 2018.
2. On or about January 16, 2014, **CURTIS** organized and registered with the Missouri Ethics Commission a campaign committee, “Curtis for MO.”
3. **CURTIS** maintained a bank account for the “Curtis for MO” campaign committee at Regions Bank in St. Louis, Missouri. **CURTIS** was an authorized signatory on that bank account, and had complete access to the account and funds within that account. **CURTIS** also maintained a primary personal bank account at Regions Bank, and was an authorized signatory on that bank account, and had complete access to the account and funds within that account.

B. SCHEME TO DEFRAUD

4. Beginning on or about January 1, 2016 and continuing through on or about December 31, 2017, both dates being approximate and inclusive, in the Eastern District of Missouri and elsewhere, the defendant,

**COURTNEY CURTIS,**

devised, intended to devise, and knowingly participated in a scheme to defraud and to obtain money from donors to the “Curtis for MO” campaign committee by means of materially false and fraudulent pretenses, representations, and promises.

5. It was a part of the scheme that, on one and more occasions, **CURTIS** misled donors by falsely representing, and causing to be falsely represented, that money contributions to the “Curtis for MO” campaign committee would be used for campaign and reelection purposes, when, in fact, **CURTIS** used a substantial portion of the money contributed by donors to the “Curtis for MO” campaign committee for his own personal use and expenses.

6. It was a further part of the scheme that after fraudulently convincing individuals and organizations to donate money to the “Curtis for MO” campaign committee, **CURTIS** knowingly used monies in the “Curtis for MO” campaign committee bank account for his own benefit, unrelated to any legitimate campaign or reelection purpose, in various ways, including but not limited to: Using money in the account to pay for his apartment rental and utility bills; paying for hotel, airfare and travel expenses for himself and others; paying for restaurant and bar bills; withdrawing funds from the account through substantial cash withdrawals; and, using money in the account to purchase retail items for his personal use. Additionally, from time to time, **CURTIS** deposited campaign donation checks directly into his personal bank account, and used those funds to pay for personal living expenses unrelated to any legitimate campaign or reelection purpose.

7. It was a further part of the scheme that **CURTIS** acted to conceal his scheme by failing to file required reports with the Missouri Ethics Commission, or by filing false reports with the Missouri Ethics Commission, which failed to identify his cash withdrawals from the “Curtis for MO” campaign committee bank account, failed to identify payments made directly from the “Curtis for MO” campaign committee bank account which were made for his own personal use, unrelated to any campaign or reelection purpose, and failed to identify campaign donation checks received and deposited to his personal bank account.

8. It was a further part of the scheme, and a result of his scheme, that **CURTIS** obtained approximately \$47,867.69 from his “Curtis for MO” campaign committee bank account, which funds **CURTIS** used for his own personal use, unrelated to any campaign or reelection purpose.

C. THE WIRES

**COUNT ONE**

9. On or about March 6, 2017, within the Eastern District of Missouri and elsewhere, for the purpose of executing his scheme to defraud and to obtain money and property by means of false and fraudulent pretenses, and representations, the defendant made a point of sale withdrawal of \$200.00, transmitted via the internet, at the Ameristar casino, located in St. Charles, Missouri, which resulted in funds totaling \$204.91 being withdrawn from defendant’s “Curtis for MO” campaign account at Regions Bank. Defendant used the withdrawn funds for his own personal use unrelated to any legitimate campaign or reelection purpose.

**COUNT TWO**

10. On or about May 18, 2017, within the Eastern District of Missouri and elsewhere, for the purpose of executing his scheme to defraud and to obtain money and property by means of false and fraudulent pretenses, and representations, the defendant made a payment for defendant’s

personal hotel and travel expenses in the amount of \$507.62, which funds originated from defendant's "Curtis for MO" campaign account at Regions Bank, and which funds were transmitted via the internet to Expedia through its payment processing center located in Redmond, Washington.

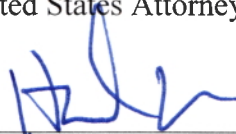
**COUNT THREE**

11. On or about October 18, 2017, within the Eastern District of Missouri and elsewhere, for the purpose of executing the above-described scheme to defraud and to obtain money and property by means of false and fraudulent pretenses, and representations, the defendant made a payment for defendant's personal travel expenses in the amount of \$323.74, which funds originated from defendant's "Curtis for MO" campaign account at Regions Bank, and which funds were transmitted via the internet to Priceline.com through its payment processing center located in Norwalk, Connecticut.

All in violation of Title 18, United States Code, Section 1343.

Respectfully submitted,

JEFFREY B. JENSEN  
United States Attorney



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UNITED STATES OF AMERICA       )  
EASTERN DIVISION                )  
EASTERN DISTRICT OF MISSOURI   )

I, Hal Goldsmith, Assistant United States Attorney for the Eastern District of Missouri,  
being duly sworn, do say that the foregoing information is true as I verily believe.



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HAL GOLDSMITH, #32984(MO)

Subscribed and sworn to before me this 19th day of October, 2020.



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Gregory. J. Linhares  
CLERK, U.S. DISTRICT COURT

By: /s/Jason W. Dockery  
DEPUTY CLERK